# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF OKLAHOMA

IN RE: BROILER CHICKEN GROWER ANTITRUST LITIGATION (NO. II)

This document relates to all actions.

Case No. 6:20-MD-02977-RJS-CMR

Chief Judge Robert J. Shelby

Magistrate Judge Cecilia M. Romero

# JOINT STATUS REPORT REGARDING PLAINTIFFS' SETTLEMENT WITH PILGRIM'S PRIDE CORP.

The Parties write to provide an update regarding finalization of the proposed settlement with Pilgrim's Pride Corp. ("PPC"). On July 10, 2024, the Parties executed a binding term sheet memorializing the material settlement terms. That same day, the Parties began negotiating a long-form settlement agreement, which the Parties finalized and executed on August 6, 2024. The Parties have been working cooperatively to finalize the papers associated with moving for preliminary approval of the settlement and dissemination of class notice. The Parties previously informed the Court that they believed those filings would occur by Wednesday, August 14, 2024. However, the Parties now anticipate that the filings will occur by Friday, August 16, 2024.

By way of further update, Plaintiffs will file, contemporaneously with submission of the PPC settlement preliminary approval and notice papers, a motion to distribute funds to class members in connection with the settlement with Sanderson Farms, Inc. and to authorize a supplemental distribution of additional funds to class members in connection with the settlements with Tyson Foods, Inc. and Perdue Farms, LLC.

Dated: August 13, 2023 Respectfully submitted,

/s/ Gary I. Smith, Jr.

Gary I. Smith, Jr.\* Kyle G. Bates\* HAUSFELD LLP

600 Montgomery St, Ste 3200 San Francisco, CA 94111

Telephone: (415) 633-1908 Facsimile: (415) 633-4980 Email: gsmith@hausfeld.com /s/ David E. Ross

David E. Ross\* Kevin Cyrulnik\* Henry Brownstein\*

KASOWITZ BENSON TORRES LLP

1633 Broadway New York, NY 10019 Tel: 212-506-1700

Fax: 212-506-1800

Email: kbates@hausfeld.com

Michael D. Hausfeld\* James J. Pizzirusso\*

Melinda R. Coolidge\* Samantha Derksen\*

HAUSFELD LLP

888 16th Street, NW, Suite 300

Washington, DC 20006
Telephone: (202) 540-7200
Facsimile: (202) 540-7201
mhausfeld@hausfeld.com
jpizzirusso@hausfeld.com
mcoolidge@hausfeld.com
sderksen@hausfeld.com

Kyle G. Bates\*

### HAUSFELD LLP

33 Whitehall St., 14<sup>th</sup> Floor New York, NY 10004

Telephone: (415) 744-1966 Facsimile: (212) 202-4322 kbates@hausfeld.com

Eric L. Cramer\*
Ellen Noteware\*
Patrick F. Madden\*
Michaela L. Wallin\*
David Langer\*

## BERGER MONTAGUE PC

1818 Market Street, Suite 3600 Philadelphia, PA 19103

Telephone: (215) 875-3000 Facsimile: (215) 875-4604

ecramer@bm.net enoteware@bm.net pmadden@bm.net mwallin@bm.net dlanger@bm.net

Daniel J. Walker\*

BERGER MONTAGUE PC

1001 G Street, NW, Suite 400 East

Washington, DC 20001 Telephone: (202) 559-9745

dwalker@bm.net

dross@kasowitz.com kcyrulnik@kasowitz.com hbrownstein@kasowitz.com

Larry D. Ottaway, OK Bar #6816 Amy Sherry Fischer, OK Bar #16651 FOLIART HUFF OTTAWAY & BOTTOM

201 Robert S. Kerr. Ave., 12th Floor

Oklahoma City, OK 73102

Tel: 405-232-4633 Fax: 405-232-3462

larryottaway@oklahomacounsel.com amyfischer@oklahomacounsel.com

## Counsel for Pilgrim's Pride Corporation

\* admitted pro hac vice

# Co-Lead Counsel for Plaintiffs and the

## **Proposed Class**

M. David Riggs

Donald M. Bingham

Kristopher Koepsel

#### RIGGS ABNEY NEAL TURPEN ORBISON &

#### LEWIS

502 West Sixth Street

Tulsa, OK 74119

Telephone: (918) 699-8914 Facsimile: (918) 587-9708 driggs@riggsabney.com

don\_bingham@riggsabney.com kkoepsel@riggsabney.com

William A. Edmondson (OBA No. 2628)

# RIGGS ABNEY NEAL TURPEN ORBISON &

#### LEWIS

528 N.W. 12th Street Oklahoma City, OK

73103 Telephone: (405) 843-9909

Facsimile: (405) 842-2913 dedmondson@riggsabney.com

# Liaison Counsel for Plaintiffs and the Proposed Class

Larry D. Lahman (OBA No. 5166)

Roger L. Ediger (OBA 19449)

#### MITCHELL DECLERK, PLLC

202 West Broadway Avenue

Enid, OK 73701

Telephone: (580) 234-5144 Facsimile: (580) 234-8890

ldl@mdpllc.com rle@mdpllc.com

Warren T. Burns\*

#### **BURNS CHAREST, LLP**

900 Jackson Street, Suite 500

Dallas, TX 75202

Telephone: (469) 904-4550 Facsimile: (469) 444-5002 wburns@burnscharest.com

Gregory L. Davis\*

DAVIS & TALIAFERRO, LLC

# 7031 Halcyon Park Drive Montgomery, AL

36117

Telephone: (334) 832-9080 Facsimile: (334) 409-7001 gldavis@gregdavislaw.com

Charles D. Gabriel\*

#### CHALMERS & ADAMS LLC

North Fulton Satellite Office

5755 North Point Parkway, Suite 251

Alpharetta, GA 30022

Telephone: (678) 735-5903 Facsimile: (678) 735-5905 cdgabriel@cpblawgroup.com

Larry S. McDevitt\*

David M. Wilkerson\*

#### VAN WINKLE LAW FIRM

11 North Market Street Asheville, NC 28801

Telephone: (828) 258-2991 Facsimile: (828) 257-2767 lmcdevitt@vwlawfirm.com dwilkerson@vwlawfirm.com

#### Harlan Hentges

#### HENTGES & ASSOCIATES, PLLC

102 E Thatcher St Edmond, OK 73034

405-340-6554

Fax: 405-340-6562

harlan@organiclawyers.com

#### John C. Whitfield\*

#### WHITFIELD COLEMAN MONTOYA, PLLC

(TN)

518 Monroe Street

Nashville, TN 37208

Telephone: (615) 921-6500 Facsimile: (615) 921-6501 jwhitfield@wcbfirm.com

## J. Dudley Butler\*

# BUTLER FARM & RANCH LAW GROUP,

**PLLC** 

499-A Breakwater Drive Benton, MS 39039

Telephone: (662) 673-0091

Facsimile: (662) 673-0091 jdb@farmandranchlaw.com

Daniel M. Cohen\*

## CUNEO GILBERT & LADUCA, LLP

4725 Wisconsin Ave., NW Suite 200

Washington, DC 20016 Telephone: (202)789-3960 Facsimile: (202)789-1813 Danielc@cuneolaw.com

Leah M. Nicholls\* **PUBLIC JUSTICE, PC**1620 L Street NW, Suite 630
Washington, DC 20036
Telephone: (202) 861-5245
Facsimile: (202) 232-7203

lnicholls@publicjustice.net

Kellie Lerner\*

Meegan F. Hollywood\*

Benjamin Steinberg\*

#### ROBINS KAPLAN, LLP

1325 Avenue of the Americas, Suite 2601

New York, NY 10019 Telephone: (212) 980-7400 Facsimile: (212) 980-7499 KLerner@RobinsKaplan.com

MHollywood@RobinsKaplan.com

BSteinberg@RobinsKaplan.com

M. Stephen Dampier\*

#### DAMPIER LAW FIRM

55 North Section Street

P.O. Box 161

Fairhope, AL 36532

Telephone: (251) 929-0900 Facsimile: (251) 929-0800

stevedampier@dampierlaw.com

Michael L. Silverman\*

## ROACH LANGSTON BRUNO LLP

205 North Michigan Avenue, Suite 810

Chicago, IL 60601

Telephone: (773) 969-6160 msilverman@rlbfirm.com

Grant L. Davis\*
Thomas C. Jones\*
Timothy Gaarder\*
Thomas E. Ruzicka, Jr.\*

DAVIS BETHUNE & JONES, LLC
1100 Main St, Ste 2930 Kansas City, MO
64105 Telephone: (816) 421-1600
gdavis@dbjlaw.net
tgaarder@dbjlaw.net
tjones@dbjlaw.net
truzicka@dbjlaw.net

Robert Bonsignore, Esq.\* **BONSIGNORE, TRIAL LAWYERS, PLLC**23 Forest St
Medford, MA 02155
Telephone: (781) 350-0000
rbonsignore@class-actions.us

Additional Class Counsel for Plaintiffs and the Proposed Class

<sup>\*</sup> admitted *pro hac vice* 

# **CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2024 I electronically transmitted a true and correct copy of the foregoing document to the Clerk of Court for filing using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Gary I. Smith, Jr.
Gary I. Smith, Jr.